

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

TTI CONSUMER POWER TOOLS, INC., F/K/A
ONE WORLD TECHNOLOGIES, INC. D/B/A
TECHTRONIC INDUSTRIES POWER
EQUIPMENT,

Plaintiff,

v.

ENGINEERED PLASTIC COMPONENTS, INC.,

Defendant,

and

ENGINEERED PLASTIC COMPONENTS, INC.,

Counter-Plaintiff,

v.

TTI CONSUMER POWER TOOLS, INC., F/K/A
ONE WORLD TECHNOLOGIES, INC. D/B/A
TECHTRONIC INDUSTRIES POWER
EQUIPMENT,

Counter-Defendant.

Civil Action No. 8:22-cv-04085-JDA

Defendant/Counter-Plaintiff Engineered Plastic Components, Inc.'s motion for extension of time to work on joint statement of stipulated facts

The deadline for summary judgment motions in this matter is currently April 15, 2025.

Pursuant to the Summary Judgment Motion Procedures for Judge Austin, the parties are required to work toward a joint statement of material facts not in dispute. The undersigned requests additional time to present proposed stipulated material facts to opposing counsel until and including Monday March 31, 2025. This requested extension is not expected to delay the submission of summary judgment motions, and no previous request has been made to extend this deadline.

Prior to submitting this motion, the undersigned consulted with opposing counsel about whether they would consent to this extension request but thus far consent has not been forthcoming.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Robert Y. Knowlton

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